

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

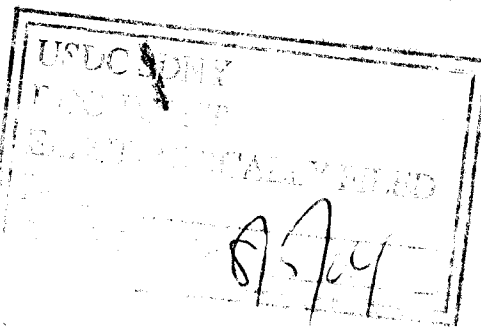
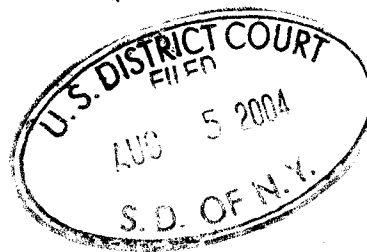
- v. -

JAHLIL BROWN,
a/k/a "Jolly,"
KEVIN JACKSON,
a/k/a "Kevin Peterson,"
a/k/a "Treppants,"
RYAN KING,
a/k/a "Gary,"
a/k/a "Longers,"
VIVIAN MONTAQUE,
a/k/a "Wolfie,"
ANTHONY PHILLIPS,
a/k/a "Curtis,"
DESMOND SHAW,
a/k/a "Milton Davis,"
a/k/a "Junior,"
KARL WILSON,
a/k/a "Barry"

Defendants.

INDICTMENT

S1 04 Cr. 801



COUNT ONE

The Grand Jury charges:

1. From in or about June 1999 to in or about April 2004, in the Southern District of New York and elsewhere, the defendants, JAHLIL BROWN, a/k/a "Jolly," KEVIN JACKSON, a/k/a "Kevin Peterson," a/k/a "Treppants," RYAN KING, a/k/a "Gary," a/k/a "Longers," VIVIAN MONTAQUE, a/k/a "Wolfie," ANTHONY PHILLIPS, a/k/a "Curtis," DESMOND SHAW, a/k/a "Milton Davis," a/k/a "Junior," KARL WILSON, a/k/a "Barry," and others known and unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and

with each other to violate the narcotics laws of the United States.

2. It was a part and an object of this conspiracy that JAHLIL BROWN, KEVIN JACKSON, RYAN KING, VIVIAN MONTAQUE, ANTHONY PHILLIPS, DESMOND SHAW, and KARL WILSON, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly, would and did distribute and possess with intent to distribute a controlled substance, to wit, 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846.

OVERT ACTS

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about June 20, 2002, at 2512 7th Avenue, New York, New York, JAHLIL BROWN, KEVIN JACKSON, RYAN KING, ANTHONY PHILLIPS, and KARL WILSON kicked, punched, and stabbed Dennis Paulk, thereby causing Paulk's death, after Paulk attempted to rob one of their co-conspirators of marijuana.

b. On or about June 12, 1999, ANTHONY PHILLIPS was arrested for selling marijuana to an undercover police officer in front of 2512 7th Avenue, New York, New York.

c. On or about October 14, 1999, VIVIAN MONTAQUE was arrested for possessing marijuana at 2512 7th Avenue, New York, New York.

d. On or about April 3, 2000, KEVIN JACKSON and ANTHONY PHILLIPS were arrested for selling marijuana to an undercover police officer in the vicinity of at 2512 7th Avenue, New York, New York.

e. On or about June 6, 2000, KEVIN JACKSON was arrested and charged with possessing more than 1 lb. of marijuana in front of 2512 7th Avenue, New York, New York.

f. On or about September 20, 2000, JAHLIL BROWN was arrested for selling marijuana to an undercover police officer at 2512 7th Avenue, New York, New York.

g. On or about October 7, 2000, JAHLIL BROWN and KARL WILSON were arrested in connection with the execution of a search warrant at 2512 7th Avenue, Apartment 45, New York, New York. During the execution of the search warrant, the police recovered marijuana from the apartment.

h. On or about December 8, 2000, JAHLIL BROWN and KARL WILSON were arrested in connection with the execution of a search warrant at 2512 7th Avenue, New York, New York. During the execution of the search warrant, the police recovered marijuana from the apartment.

i. On or about July 21, 2000, KEVIN JACKSON was arrested in connection with the execution of a search warrant at 2512 7th Avenue, Apartment 32, New York, New York. During the execution of the search warrant, the police recovered marijuana from the apartment.

j. On or about July 21, 2000, ANTHONY PHILLIPS was arrested for selling marijuana to an undercover police officer in the vicinity of 2512 7th Avenue, New York, New York.

k. On or about January 13, 2001, KARL WILSON was arrested in connection with the execution of a search warrant at 2512 7th Avenue, Apartment 45, New York, New York. During the execution of the search warrant, the police recovered marijuana from the apartment.

l. On or about May 12, 2001, RYAN KING was arrested for possessing marijuana at 2512 7th Avenue, New York, New York.

m. On or about September 7, 2001, RYAN KING was arrested in connection with the execution of a search warrant at 2512 7th Avenue, New York, New York. During the execution of the search warrant, the police recovered marijuana.

n. On or about November 6, 2001, KARL WILSON was arrested in connection with the execution of a search warrant at 2512 7th Avenue, New York, New York. During the execution of the search warrant, the police recovered marijuana from the apartment.

o. On or about November 30, 2001, JAHLIL BROWN was arrested for selling marijuana to an undercover police officer inside 2512 7th Avenue, New York, New York.

p. On or about December 8, 2001, RYAN KING was arrested for selling marijuana to an undercover police officer inside 2512 7th Avenue, New York, New York.

q. On or about December 14, 2001, KEVIN JACKSON was

arrested and charged with unlawfully trespassing at 2512 7th Avenue, New York, New York.

r. On or about January 3, 2002, RYAN KING and KARL WILSON were arrested in connection with the execution of a search warrant at 2512 7th Avenue, Apartment 45, New York, New York. During the execution of the search warrant, the police recovered marijuana from the apartment.

s. On or about January 3, 2002, ANTHONY PHILLIPS was arrested in connection with the execution of a search warrant at 2512 7th Avenue, Apartment 51, New York, New York. During the execution of the search warrant, the police recovered marijuana from the apartment.

t. On or about April 3, 2002, RYAN KING was arrested in connection with the execution of a search warrant at 2512 7th Avenue, Apartment 45, New York, New York. During the execution of the search warrant, the police recovered marijuana from the apartment.

u. On or about May 8, 2002, ANTHONY PHILLIPS was arrested in connection with the execution of a search warrant at 2512 7th Avenue, Apartment 45, New York, New York. During the execution of the search warrant, the police recovered marijuana, a firearm, ziploc bags, and two scales from the apartment.

v. In or about August 2002, DESMOND SHAW and others known and unknown, unloaded between 800 and 1200 lbs. of marijuana from a truck in the vicinity of West 150th Street, New York, New York.

w. On or about January 7, 2003, KARL WILSON was

arrested for selling marijuana to an undercover police officer in the vicinity of 2518 8th Avenue, New York, New York.

x. On or about April 1, 2004, RYAN KING and ANTHONY PHILLIPS were arrested in connection with the execution of a search warrant at 29 West 118th Street, New York, New York. During the execution of the search warrant, the police recovered more than 4 lbs. of marijuana, and drug paraphernalia, including ziploc bags and scales, from various locations throughout the apartment.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

4. From at least in or about May 2000 through at least in or about December 2002, in the Southern District of New York and elsewhere, KEVIN JACKSON, a/k/a "Kevin Peterson," the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the conspiracy charged in Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, to wit, a handgun.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT THREE

The Grand Jury further charges:

5. From at least in or about March 2000 through at least in or about March 2003, in the Southern District of New York and elsewhere, RYAN KING, a/k/a "Gary," a/k/a "Longers," the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the conspiracy charged in Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, to wit, a handgun.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT FOUR

The Grand Jury further charges:

6. From at least in or about August 2000 through at least in or about December 2002, in the Southern District of New York and elsewhere, ANTHONY PHILLIPS, a/k/a "Curtis," the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the conspiracy charged in Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, to wit, a handgun.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT FIVE

The Grand Jury further charges:

7. From in or about December 2001 through in or about December 2002, in the Southern District of New York and elsewhere, KARL WILSON, a/k/a "Barry," the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the conspiracy charged in Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, to wit, a handgun.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT SIX

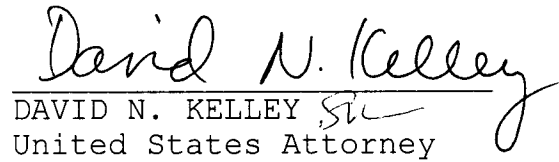
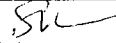
The Grand Jury further charges:

8. From in or about December 2002 through in or about May 2003, in the Southern District of New York and elsewhere, JAHLIL BROWN, a/k/a "Jolly," the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the conspiracy charged in Count One of this Indictment, did use and

carry a firearm, and, in furtherance of such crime, did possess a firearm, to wit, a handgun.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)


Foreperson


DAVID N. KELLEY 
United States Attorney

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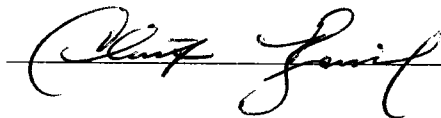
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S1 04 Cr.

(Title 21, United States Code, Section
846, Title 18 United States Code, Section
924(c).)

DAVID N. KELLEY
United States Attorney

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Foreperson.